

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

| | |
|--|---------------------------|
| In re: |) Chapter 11 |
| |) |
| FTX TRADING LTD., <i>et al.</i> ¹ |) Case No. 22-11068 (JTD) |
| |) |
| Debtors. |) (Lead Case) |
| |) |
| |) (Jointly Administered) |
| |) |

**CERTIFICATE OF NO OBJECTION REGARDING
EMERGENT DEBTOR'S MOTION TO DISMISS**

Jody C. Barillare, as counsel to Emergent Fidelity Technologies Ltd, as debtor and debtor-in-possession (the “Emergent Debtor”), hereby certifies as follows:²

1. On January 2, 2025 the Emergent Debtor moved for entry of an order, pursuant to sections 105(a), 305(a), and 1112(b) of the Bankruptcy Code, Bankruptcy Rule 1017, and Local Rule 1017-2, dismissing the Emergent Chapter 11 Case and granting related relief (the “Motion”) [D.I. 29108].

2. The Emergent Debtor filed a notice form regarding the Motion, setting forth January 16, 2025 at 4:00 p.m. (ET) as the deadline for filing a response to the Motion (the “Objection Deadline”) and January 23, 2025 at 10:00 a.m. (ET) as the hearing date (the “Notice Form”) [D.I. 29109].

3. The Emergent Debtor served the Notice Form, the Motion, and the exhibit(s) thereto as reflected in the Certificate of Service filed by the Emergent Debtor [D.I. 29110].

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

² Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Motion.

4. As of the filing of this certificate, more than twenty-four (24) hours have elapsed since the Objection Deadline, and to the best of the knowledge of the undersigned counsel, no responsive pleading or objection has been filed with the Court on the docket of the above-captioned chapter 11 cases or the chapter 11 case of the Emergent Debtor, or served upon the Emergent Debtor or its counsel.

5. Accordingly, the Emergent Debtor respectfully requests entry of the Proposed Order attached to the Motion and attached hereto as **Exhibit A**.

[Signature page to follow]

Dated: January 17, 2025
Wilmington, DE

MORGAN, LEWIS & BOCKIUS LLP

/s/ Jody C. Barillare

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*Counsel for Emergent Fidelity
Technologies Ltd as Debtor and Debtor-in-
Possession*

CERTIFICATE OF SERVICE

I, Jody C. Barillare, hereby certify that on January 17, 2025, I caused to be served copies of the *Certificate of No Objection Regarding Emergent Debtor's Motion to Dismiss* to all parties consenting to service through the Court's CM/ECF system.

Dated: January 17, 2025
Wilmington, DE

MORGAN, LEWIS & BOCKIUS LLP

/s/ Jody C. Barillare
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EXHIBIT A

Proposed Order

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| Debtors. |) (Lead Case) |
| |) |
| |) (Jointly Administered) |
| |) |
| |) RE: D.I. 29108 |
| |) |

**ORDER DISMISSING THE CHAPTER 11 CASE OF
EMERGENT FIDELITY TECHNOLOGIES LTD**

Upon the motion (the “Motion”)⁴ of Emergent Fidelity Technologies Ltd (“Emergent”), as debtor and debtor-in-possession in Case No. 23-10149-JTD, for entry of an order, pursuant to sections 105(a), 305(a), and 1112(b) of the Bankruptcy Code, Bankruptcy Rule 1017, and Local Rule 1017-2, dismissing the Emergent Chapter 11 Case and granting related relief; and the Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the Amended Standing Order of Reference from the United States District Court for the District of Delaware, dated February 29, 2012; and consideration of the Motion and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and venue being proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that notice of the Motion and opportunity for a hearing on the Motion were appropriate under the circumstances and no other notice need be provided; and the Court having reviewed the Motion and the Emergent Settlement;

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⁴ Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Motion.

and the Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and upon all of the proceedings had before the Court; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Motion is **GRANTED** as set forth herein.
2. All objections to the Motion or the relief requested therein that have not been withdrawn, waived, or otherwise resolved, and all reservations of rights asserted therein, are hereby overruled on the merits and denied with prejudice.
3. Pursuant to sections 105(a), 305(a), and 1112(b) of the Bankruptcy Code, the Emergent Chapter 11 Case is hereby dismissed.